

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission	:	
On Its Own Motion	:	
-vs-	:	
Ameren Illinois Company d/b/a Ameren	:	
Illinois, f/k/a Central Illinois Light	:	
Company d/b/a AmerenCILCO	:	11-0354
	:	11-0355
Ameren Illinois Company d/b/a Ameren	:	11-0356
Illinois, f/k/a Central Illinois Public	:	(Cons.)
Service Company d/b/a AmerenCIPS	:	
	:	
Ameren Illinois Company d/b/a Ameren	:	
Illinois, f/k/a Illinois Power Company	:	
d/b/a AmerenIP	:	
	:	
Reconciliation of revenues collected	:	
under power procurement riders with	:	
actual costs associated with power	:	
procurement expenditures.	:	

PROPOSED ORDER

By the Commission:

The Illinois Commerce Commission ("Commission") entered an Order ("Initiating Order") commencing the instant reconciliation proceeding. The Initiating Order directed the above-referenced Ameren utilities (collectively the "Ameren Illinois utilities," "AIUs" or "Ameren Illinois") to reconcile revenue collected under each of the [specified] tariffs, or under related provisions filed pursuant to the orders cited and authorizing the recovery of power supply costs for the reconciliation period, with costs incurred in connection with procurement activities as defined in the tariffs of each utility." The reconciliation period was the 12 months ended May 31, 2010.

Pursuant to due notice, hearings were held in this matter before a duly authorized Administrative Law Judge of the Commission at its offices in Springfield, Illinois. Appearances were entered by respective counsel for the Ameren Illinois utilities and the Commission Staff ("Staff"). The three proceedings were consolidated. No intervening petitions were filed. Evidence was presented by the Ameren Illinois utilities and Staff; at the conclusion of the hearings, the record was marked "Heard and Taken." A proposed order was served.

Background

As explained in the Initiating Order (“Initiating Order”) in the current dockets, the final order entered on January 24, 2006 in Docket No. 05-0160/0161/0162 (Cons.) (“Procurement Docket”) approved, with modifications, the initial series of tariffs and riders under which the AIUs would purchase – by means of an auction process (“Auction”) -- electric supply for delivery to customers following the January 1, 2007 expiration of the mandatory rate freeze. Among the approved tariffs for each utility was a “hub” tariff known as Rider MV. The retail charges computed in accordance with these riders applied to service provided on and after January 2, 2007; the riders required annual reconciliation proceedings, as provided for in the January 24, 2006 Order.

In an order entered on December 19, 2007 in Docket No. 07-0527, the Commission approved, with modifications, an “initial procurement plan” filed pursuant to Section 16-111.5(j) of the Public Utilities Act and Section 1-75 of the Illinois Power Agency Act. The MV tariffs approved in the Procurement Docket were later superseded by new provisions, which the Commission approved, in Docket No. 07-0527. Rider MVA, Market Value Adjustment, approved in Docket No. 07-0527, allowed the Ameren Illinois utilities to address market value adjustments for fixed-price customers for service provided through the end of May 2008.

An order approving a reconciliation of revenues collected under procurement tariffs with actual costs incurred in connection with procurement activities for the initial reconciliation period of January 2, 2007 through May 31, 2008 was approved in consolidated Docket Nos. 09-0077, 09-0078 and 09-0079.

Rider PER -- Purchased Electricity Recovery -- also approved in Docket No. 07-0527, provided for the calculation of retail charges in accordance with the new tariffs that became operational and are applicable to service provided on and after June 1, 2008. Rider PER also requires an annual reconciliation.

Rider HSS -- Hourly Supply Service -- also approved in Docket No. 07-0527, provided for the calculation of hourly retail charges in accordance with the new tariffs that became operational and are applicable to service provided on and after June 1, 2008. Rider HSS also requires an annual reconciliation.

Additional procurement events were authorized in Docket No. 08-0519, which was a power procurement proceeding initiated by the Illinois Power Agency (“IPA”). The procurement plan in Dockets No. 08-0519 covered a five-year period, beginning with the 12-month period of June 1, 2009 through May 31, 2010, which is the reconciliation period in the instant docket.

The Initiating Order notes that the three Ameren utilities were merged into one entity subsequent to the reconciliation period involved in this proceeding. Because the Ameren utilities were operating as separate entities during the reconciliation period and

had their own revenues and costs during that time, a separate proceeding was initiated for each utility.

The Initiating Order in the current dockets directed the Ameren Illinois utilities to reconcile revenue collected under each of the above-named tariffs, or under related provisions filed pursuant to the orders cited and authorizing the recovery of power supply costs for the reconciliation period, with costs incurred in connection with procurement activities as defined in the tariffs of each utility.

Additionally, the Ameren Illinois utilities were directed to include schedules presenting cumulative totals of incremental costs and cumulative totals of recoveries, by wholesale product, to the extent such information is reasonably available.

The Initiating Order further directed each utility to address in testimony specifically how it complied with the applicable procurement plan approved by the Commission for the period under review.

Also, each utility was directed to include a summary schedule detailing the internal administrative and operational costs associated with the procurement of electric power and energy for retail customers during the period under review. The Initiating Order also directed each utility to provide in testimony a conclusion about the reasonableness of these costs and the basis for that conclusion.

Procurement of Supply for the Reconciliation Period

As explained by Dominic Perniciaro and other Ameren Illinois witnesses, and as discussed below, there are three different products procured for customers who choose to take power from Ameren Illinois: fixed price, small hourly price, and large hourly price. (Ameren Ex. 3.0 at 5) The Ameren Illinois witnesses described the forecasting and procurement processes for these products.

The fixed price product, Basis Generation Service – Fixed Price (“BGS-FP”), is procured under Rider PER. During the reconciliation period, BGS-FP was available to customers with demands under 400 kW, although customers with demands between 400 kW and 1,000 kW had been declared competitive and were in a transition period whereby they could stay on BGS-FP so long as they did not take supply from Alternative Retail Suppliers (“ARES”) or Rider HSS.

RTP is the real-time hourly pricing product for small customers. The HSS product is the “Hourly Supply Service” to allow customers with demands equal to or greater than 400 kW to elect real-time hourly pricing under Rider HSS.

Basic Generation Service (“BGS”)

As described by Ameren Illinois witnesses Mr. Brueggeman and Mr. McCartney, the power supply procurement under Rider BGS came from two separate procurement

events. (Ameren Ex. 2.0 at 3) For approximately one-third of the power supply requirements, full requirements, fixed-price, power and energy supply was obtained pursuant to load-following Supplier Forward Contracts ("SFCs"), authorized in the Auction dockets. For the residential and small business customers, a ladder approach was used, whereby contract terms were 17 months, 29 months and 41 months, with each term representing approximately one-third of the load. Thus, approximately one-third of the SFCs expired on May 31, 2008, and an additional one-third of the SFCs expired at the end of the prior reconciliation period on May 31, 2009. The SFCs for the remaining one-third of the AIUs' bundled load expired at the end of the reconciliation period in the current docket, which was May 31, 2010.

For the other two-thirds of the power supply requirements for the reconciliation period, the IPA procurement process was used. Load forecasts provided by AIC to the IPA were included in the IPA's Procurement Plan, filed with the Commission in Docket No. 08-0519. (Ameren Ex. 1.0 at 4-5)

The Procurement Administrator for the 2009 procurement cycle for the AIUs' procurement requirements issued requests for proposals ("RFPs") to procure the capacity, energy, and Renewable Energy Credits ("RECs") identified in the Commission-approved procurement plan. Following the conclusion of each RFP, and Commission approvals, the AIUs entered into contracts with the winning suppliers.

Riders RTP and HSS

Mr. McCartney provided an overview of the energy and capacity procurement process associated with the customers on Rider RTP and Rider HSS. (Ameren Ex. 1.0 at 6-8) All energy associated with Rider RTP and Rider HSS was priced based on the Midwest Independent Transmission System Operator ("MISO") Locational Marginal Pricing ("LMPs") methodology, including approximately one-third of Rider RTP energy which was contracted for under existing SFCs. For each operating day during the Reconciliation Period, Ameren Illinois submitted an hourly megawatt forecast to MISO the day prior to the operating day pertaining to the applicable Rider RTP and Rider HSS load. Once submitted to MISO, this forecast became a financially binding "Demand Bid" which subsequently was priced at the MISO hourly day-ahead LMPs. Any difference between the day ahead forecast and the actual energy used by customers was settled at hourly real time LMPs.

With respect to capacity, for Rider RTP, approximately one-third of the capacity was contracted for under existing SFCs. For the remaining two-thirds of the capacity required under Rider RTP and all capacity required under Rider HSS, no additional capacity was purchased from the market for the June through January portion of the Reconciliation Period because the economic downturn caused a reduction in customer usage in Rider BGS, thus creating a small amount of excess capacity for customers on Rider BGS. This excess capacity was subsequently allocated at cost to meet the capacity requirements pertaining to Rider RTP and Rider HSS tariffs for the period June through January. According to the witness, this action was done in the interest of

minimizing costs to customers, and not doing so would have increased total costs recovered from customers. (*Id.* at 7)

Beginning in February, the load associated with the real time price tariffs grew to the point where an allocation from Rider BGS was no longer sufficient to fully meet the capacity requirements. Thus, for the period February through May, the excess capacity from Rider BGS was allocated to Rider RTP and Rider HSS, but an additional amount of capacity was purchased from the MISO Voluntary Capacity Auction to satisfy the total capacity requirement.

Testimony Regarding Prudence

Mr. McCartney testified that AIC's tariffs for Rider RTP and Rider HSS define the general parameters for procuring the capacity and energy required to serve the Company's real time pricing customer load, and that the capacity and energy purchases made by the Company on behalf of the real time pricing customer load were made in a manner consistent with the parameters included in these tariffs. (Ameren Ex. 1.0 at 8)

According to Mr. Brueggeman, Section 16-111.5(l) of the PUA governs an electric utility's recovery of costs of procuring power and energy via the IPA procurement process. He said this section explicitly allows for full cost recovery of all of Ameren Illinois' cost of procuring power and energy via the IPA procurement process, including the cost associated with the long-term energy swaps mandated by Section 16-111.5(k) of the PUA, and that the purchases made via the IPA procurement process were made in a manner consistent with the procurement provisions of the PUA and the Commission's order in Docket No. 08-0519. (Ameren Ex. 2.0 at 7-8)

Testimony regarding the prudence of internal operating and administrative expenses under Riders PER and HSS was offered by AIC witness Leonard Jones and is discussed below.

Internal Administrative and Operational Costs

AIC witness Mr. Jones testified that administrative costs are recovered through a provision called the Supply Cost Adjustment (SCA) – Procurement in Rider PER – Purchased Electricity Recovery (Rider PER), and Rider HSS – Hourly Supply Service (Rider HSS). The SCA Procurement charge was established through general rate cases, and specifically for the period under this reconciliation, the charge up to May 6, 2010 was established in Docket 07-0585 (consolidated) and Docket 09-0306 (consolidated) thereafter. In those dockets, a charge per kilowatt-hour (kWh) is established in general rate cases and applied only to energy supplied by AIC. Therefore, the SCA-Procurement provision in Riders PER and HSS do not contain a "true-up" or reconciliation provision. (Ameren Ex. 6.0 at 3-4)

With respect to the types of costs recovered in the SCA-Procurement charge, both Rider PER and Rider HSS contain similar tariff language, stating that the

adjustment compensates the Company for “all direct and indirect costs of procuring and administering electric power and energy supply for its Customers” other than amounts recovered elsewhere in tariffs such as the working capital adjustment and the uncollectibles adjustment. As noted in the tariffs, “[t]hese costs incurred by the Company will include, where applicable, professional fees, costs of engineering, supervision, insurance, payments for injury and damage awards, taxes, licenses, and any other administrative and general expense” not already included in the prices for power and energy service, and “[t]he amount of this adjustment shall be established by the Commission in a Delivery Services rate case.”

With respect to administrative costs incurred in subsequent reconciliation periods, Staff witness Theresa Ebrey, who is an Accountant in the Accounting Department of the Financial Analysis Division of the Commission and a certified public accountant, proposed a tariff revision that provides for a reconciliation of the procurement costs included in Rider PER and Rider HSS. By way of explanation, she said the procurement adjustment which includes the administrative and operational costs associated with power procurement is one of the components of both Rider PER and Rider HSS. Therefore, it falls under Section 16-111.5(l) of the Public Utilities Act, which provides that the formula rate which established Rider PER shall contain provisions ensuring that its application does not result in over or under recovery of costs. 220 ILCS 5/16-111.5(l). No reconciliation of the administrative and operational costs incurred and reflected in the procurement adjustment to determine any over or under recovery has ever been conducted. (Staff Ex. 2.0 at 3)

She also recommended that AIC provide an explanation of how any over or under recovery will be passed through to ratepayers. Current tariff language provides for the adjustment to be revised after each subsequent Delivery Services rate case; however, since Ameren has opted to file for rate increases under the current “formula rate” schedules, it is unknown how the SPA would ever be revised. (*Id.* at 5)

Ms. Ebrey also testified, however, that not all of the issues related to such tariff revisions must be fully resolved prior to the approval of the reconciliation attached to her testimony as discussed below. Therefore, she recommended that the Commission approve the reconciliation as recommended with the assurance that the issues raised concerning the procurement costs will be resolved in the near future. (*Id.* at 5-6)

Ameren Illinois witness Mr. Jones addressed Staff’s position with respect to the inclusion of new language for Rider PER and Rider HSS that would provide for a reconciliation of administrative costs in future proceedings. (Ameren Ex. 8.0 at 2) Mr. Jones’ testimony included proposed language to address Staff’s recommendation. The Company agreed with the spirit of the language proposed by Staff, but recommended adjusting it to reflect the status of other reconciliation proceedings. Specifically, the Company wants the language to reflect that reconciliation schedules had not yet been filed in Docket No. 12-0548, which is the proceeding initiated to address the power procurement reconciliation for the June 2010 through May 2011 period. Mr. Jones also set forth proposed language to address how any over or under recovery of procurement

administrative costs would be passed through to customers. Ameren Illinois agreed with Staff that the issues regarding proposed tariff language need not be fully resolved prior to the approval of the reconciliation provided in Staff schedules presented in the current proceeding. The Company represents that it is committed to working with Staff on proposed tariff revisions and will submit a separate filing seeking Commission approval. Revisions identified by both Staff and the Company will be prospective and will not affect this reconciliation.

With respect to the issues raised by Ms. Ebrey, the Commission finds the approach agreed to by Staff and Ameren Illinois to be reasonable. As noted above, it will involve, among other things, a filing by Ameren Illinois seeking approval of certain tariff revisions.

Reconciliation of Costs and Revenues

Reconciliations of costs and revenues for each Ameren Illinois utility were presented for the 12 months ending May 31, 2010, as explained by Ameren Illinois witness Mr. Perniciaro.

Ameren Exhibits 3.01, 3.02 and 3.03 show the recovery of the Company's total allowable costs over the 12-month reconciliation period ending May 31, 2010 for the fixed price product, Basic Generation Service – Fixed Price (“BGS-FP”), and hourly price for small customer products (“RTP”) under Rider PER. (Ameren Ex. 3.0 at 3)

Ameren Exhibits 3.04, 3.05 and 3.06 show the recovery of the Company's total allowable costs over the 12-month reconciliation period ending May 31, 2010 for the hourly price product for large customers under Rider HSS.

Ameren Exhibits 3.07, 3.08 and 3.09 summarize the Company's total allowable costs over the 12-month reconciliation period ending May 31, 2010 under Riders PER and HSS and the Factor O requested by Ameren Illinois based upon the proposed adjustments. Ameren Exhibit 3.10 shows the amounts filed for each recovery period since January 2007 compared to how they should have been reported and the resulting variance.

Ameren Exhibit 3.11 is a schedule of the internal administrative and operational costs associated with procuring electric power and energy for retail customers over the 12-month reconciliation period ending May 31, 2010.

For customers who chose to take power from Ameren Illinois, three products were procured. The fixed-price product, BGS-FP, is procured under Rider PER. RTP is the real-time hourly pricing product for small customers, with approximately two-thirds of supply coming from the MISO market. The HSS product is the “Hourly Supply Service” to allow customers with demands equal to or greater than 400 kW to elect real-time hourly pricing under Rider HSS.

Below is a list of each applicable cost source cross-referenced to the service category to which it applies:

Auction Suppliers:	BGS-FP; RTP
MISO Energy Costs:	BGS-FP; RTP; HSS
MISO Market Settlement:	BGS-FP; RTP; HSS
Rider QF Costs:	BGS-FP; RTP
Ancillary Services:	BGS-FP; RTP; HSS
Capacity:	BGS-FP; RTP; HSS
Company Use & Free Service under Franchises:	BGS-FP; RTP

Mr. Perniciaro also identified adjustments made in the reconciliation. Internal analysis conducted in December of 2009 reflected that a tie-line meter between two legacy utilities, AmerenCIPS and AmerenIP, had the sign reversed since June 4, 2009. Once the error was discovered, settlement data provided to MISO had been corrected; however, MISO only accepts corrections up to 105 days. Thus, data back to September 10 had been corrected, but settlement data accepted at MISO for the period from June 4 to September 9 still reflects the tie-line meter sign reversal. A “shadow” settlement estimate that Ameren Illinois would provide to MISO if resettlement were to be allowed for the period was created by the load settlement personnel to determine the MWHs in question on an hourly basis. The hourly MWHs were priced at the hourly real-time LMPs and aggregated. The result is approximately 183,721 MWH and \$7,187,828 will be taken from AmerenCIPS and given to AmerenIP. In other words, AmerenCIPS costs have been lowered and AmerenIP costs have been increased by an offsetting amount – as if a MISO settlement had been accepted for the period in question.

Internal analysis conducted in October of 2010 found that some Ameren Illinois revenue was not being included in Rider HSS recoveries because the customer billing system characterized the billings as miscellaneous -- rather than Rider -- revenue. (Ameren Ex. 3.0 at 7) The issue resulted in Rider HSS under reporting revenues and an over recovery of \$6,619,363.01 from June 2008 through June 2010. Of this total, \$585,403.10 of the over-recovered amount related to the reconciliation period from June 2010 through May 2011 and was included as a Factor A in the January 2011 filing. \$2,340,856.16 of the over-recovered amount related to the reconciliation period from June 2008 through May 2010 and will be included as a Factor A. The remaining over-recovered amount of \$3,693,103.75 relates to the reconciliation period from June 2009 through May 2010:

AmerenCIPS:	\$1,191,872.42 for the period from June 2009 – May 2010
AmerenCILCO:	\$450,530.27 for the period from June 2009 – May 2010
AmerenIP:	\$2,050,701.06 for the period from June 2009 – May 2010

During the reconciliation process, it was determined that \$9,574.34 in sales were made to City Water, Light, and Power (“CWLP”) according to a boundary line agreement with AmerenCILCO and not included as revenue in Rider PER. These sales

are typically the result of emergency situations and/or non-recurring in nature. In addition, internal analysis conducted in January of 2011 determined that the workpapers calculating the unamortized balance in the filings had a flaw that resulted in a reduction in the balance at a quicker pace than the general ledger. This resulted in an over-recovered balance, in aggregate, in the general ledger compared to the unamortized balance in the filing. Ameren Exhibit 3.7 indicates the amount per Rate Zone and reconciliation period for the periods from January 2007 through the most current filing. Staff was notified of the issue in February of 2011 and it was corrected in the March 2011 filing in order to correct the balances as quickly as possible to reflect the calculation correction in the work papers.

On behalf of the Commission Staff, Ms. Ebrey offered testimony identified as Staff Exhibit 1.0. Attached thereto were Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC, which present a summary of the reconciliation per Staff for the various components of Rider PER and Rider HSS for reach utility. In addition, each Schedule 1.01 presents the Ameren Illinois reconciliation of each product, applicable adjustments, and the resulting Staff reconciliation. Ms. Ebrey noted the agreement between Staff and Ameren Illinois with respect to the reconciliation amounts included in Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC.

In her testimony, Ms. Ebrey proposed several adjustments to correct allocation errors discovered by the Company during the preparation of the response to Staff data request ("DR") TEE 1.10. Subsequently, the Company corrected the calculations and provided the supplemental response to Staff DR 1.10 on May 7, 2012. Ms. Ebrey's schedules reflect the adjustment amounts contained on the Company's response to TEE 1.10S.

Ameren Illinois witness Mr. Perniciaro agreed with adjustments proposed by Staff and recommended that the Commission approve amounts shown in Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC attached to Staff's direct testimony. (Ameren Ex. 4.0.)

Commission's Conclusions, Findings and Ordering Paragraphs

In the instant docket, the Initiating Order directed the Ameren Illinois utilities "to present evidence to show the reconciliation of revenues collected under the respective tariffs with costs incurred in connection with proper procurement activities as defined in the tariffs of each utility, all as is more fully described hereinabove" for the reconciliation period of June 1, 2009, through May 31, 2010.

The Commission finds that for the reconciliation period of June 1, 2009, through May 31, 2010, Auction purchases of full-requirements power and energy supply to serve fixed-price customer load were made in accordance with the process established in the Procurement Docket. These Auction purchases were proper procurement activities within the meaning of the Initiating Order in the instant proceeding.

For the reconciliation period of June 1, 2009, through May 31, 2010, purchases made pursuant to the IPA procurement process, as identified by Ameren Illinois witnesses, were made in a manner consistent with the process contemplated in the Orders in Docket No. 07-0527 and 08-0519. These purchases, including those made on behalf of real-time pricing customers, were proper procurement activities within the meaning of the Initiating Order in the instant proceeding.

The Commission also finds that reconciliations of procurement costs and revenues as set forth on Schedules 1.01CILCO, 1.01CIPS and 1.01IP in Staff Exhibit 1.0, and in the Appendices hereto, are accurate and are approved by the Commission. For AmerenCILCO, recoverable procurement costs were \$156,770,536 and revenues were \$164,915,262. For AmerenCIPS, recoverable procurement costs were \$354,233,802 and revenues were \$358,229,579. For AmerenIP, recoverable procurement costs were \$466,929,186 and revenues were \$483,486,420.

The Commission, having considered the entire record, is of the opinion and finds that:

- (1) during the reconciliation period, the Ameren Illinois utilities were Illinois corporations engaged in the transmission, sale and distribution of electricity to the public in Illinois, and were public utilities as defined in Section 3-105 of the Public Utilities Act;
- (2) the Commission has jurisdiction over the parties and the subject matter of this proceeding;
- (3) the facts recited and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) for the reconciliation period of June 1, 2009 through May 31, 2010, the reconciliations of revenues collected under the above-referenced procurement tariffs with actual costs incurred in connection with procurement activities as defined therein, as shown in and Schedules 1.01CILCO, 1.01CIPS and 1.01IP of Staff Exhibit 1.0, and in Appendices A, B and C of this Order, are accurate, and are hereby approved.
- (5) for AmerenCILCO, recoverable procurement costs were \$156,770,536 and revenues were \$164,915,262; for AmerenCIPS, recoverable procurement costs were \$354,233,802 and revenues were \$358,229,579; for AmerenIP, recoverable procurement costs were \$466,929,186 and revenues were \$483,486,420;
- (6) at May 31, 2010 AmerenCILCO had an over-recovery balance of \$27,161,965, of which \$7,233,201 had been amortized as Factor A adjustments; AmerenCIPS had an over-recovery balance of \$19,498,080

of which \$6,950,798 had been amortized as Factor A adjustments; AmerenIP had an over-recovery balance of \$24,083,765 of which \$9,284,394 had been amortized as Factor A adjustments;

- (7) for the Reconciliation Period, Ameren Illinois shall refund \$407,794 for AmerenCILCO customers; \$1,104,136 for AmerenCIPS customers; and \$2,190,754 for AmerenIP customers as Factor O refunds in the first monthly Rider PER and Rider HSS informational filings after the date of the Order in this docket.

IT IS THEREFORE ORDERED that for the reconciliation period of June 1, 2009 through May 31, 2010, the reconciliation of revenues collected under the above-referenced procurement tariffs with actual costs incurred in connection with procurement activities as defined therein, as shown in Schedules 1.01CILCO, 1.01CIPS and 1.01IP of ICC Staff Exhibit 1.0 filed on e-Docket on November 29, 2012 and as summarized in Appendices A, B and C of this Order, is hereby approved.

IT IS FURTHER ORDERED that subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

DATED: July 10, 2013

Larry M. Jones
Administrative Law Judge